

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Per Olof Magnus Magnusson, <i>et al.</i>	§	Group Art Unit:	2456
		§		
Application No.	10/597,960	§	Examiner:	Chacko, Joe
		§		
Filed:	02/23/2007	§	Confirmation No:	8466
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Attorney Docket No:	P19069-US1			
Customer No.:	27045			

For: Address Management In Mobile IP Environments

Via EFS-Web

Mail Stop Appeal Brief - Patents
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APPLICANTS' REPLY BRIEF FILED UNDER 37 C.F.R. §1.193(b)(1)

In response to the Examiner's Answer having a mail date of October 18, 2010, Appellant submits this reply brief to address the Examiner's arguments.

Remarks/Arguments

Reply to Examiner's Substantive Arguments

In the "Response to Argument" section of the Examiner's Answer, Examiner presented responsive arguments to Appellant's assertion that Koskiahde, Veerapalli, and Sharma, taken alone or in any permissible combination, fail to disclose, teach, or even suggest the elements of independent claims 1 and 9. Specifically, Appellant asserted that the cited references, taken alone or in any permissible combination, fail to disclose, teach, or even suggest "a first interface to said decision data memory for modifying said decision data" and "a second interface to one of said mobile nodes for allowing said mobile node to modify said decision data over said first interface," as

recited in independent claim 1. Substantially similar elements are recited in independent claim 9.

As indicated in the Final Office Action dated March 26, 2010, Examiner states on pages 5-6 that Veerapalli does not disclose “a second interface to one of said mobile nodes for allowing said mobile node to modify said decision data over said first interface.” In an attempt to address this deficiency of Veerapalli and (presumably) Koskiahde, Examiner cites col. 10, lines 38-42 of Sharma. Examiner reiterates this citation of Sharma in the Examiner’s Answer. Col. 10, lines 38-42 of Sharma discusses:

The mobile wireless capable devices 380, 382 can communicate with the central NMS 314 and are in this instance preferably provided with management capability over assets on the enterprise 102 network.

On page 9 of the Examiner’s Answer, Examiner alleges that this passage of Sharma “discloses a Central NMS that communicates directly to the mobile nodes through an interface similar to the first interface disclosed in the Veerapalli reference ... [and] [t]he Central NMS also discloses a management capability over assets on the network.” Appellant respectfully disagrees.

Upon closer examination, it appears that the cited passage of Sharma can be interpreted in two ways. The first interpretation involves the “mobile wireless capable devices” are the ones provided with “management capability over assets on the enterprise network,” not as asserted by the Examiner, Sharma’s “Central NMS.” This is because Sharma explicitly states that “[t]he mobile wireless capable devices ... can communicate with the central NMS and are in this instance preferably provided with management capability over assets on the enterprise network” (*emphasis added*). The “are” refers to the plural “mobile wireless capable devices” and not the singular “central NMS.” In this interpretation, Sharma’s mobile wireless capable devices may have “management capability over assets on the enterprise ... network,” but are not exerting such management capability using the connection between the mobile wireless capable devices and the central NMS. Thus, according to this interpretation, the claimed “a second interface to one of said mobile nodes for allowing said mobile node to modify said decision data over said first interface” is simply not disclosed, taught, or even suggested by the combination of references.

A second interpretation involves the Examiner's interpretation, where the central NMS is provided with management capability over assets on the enterprise network. However, nothing in Sharma, alone or in combination with Koskiahde and Veerapalli, disclose, teaches, or even suggests that Sharma's mobile wireless capable devices are the ones that are exerting the management capability over the interface with the central NMS. Sharma's mobile wireless capable devices are merely connected to the central NMS while the central NMS has management capability in an unrelated fashion to the connection with the mobile wireless capable devices. Thus, according to this interpretation, the claimed "a second interface to one of said mobile nodes for allowing said mobile node to modify said decision data over said first interface" is simply not disclosed, taught, or even suggested by the combination of references.

No matter what interpretation is taken with the cited passage of Sharma (alone or in any combination of Koskiahde and Veerapalli), the cited references simply do not disclose, teach, or even suggest "a second interface to one of said mobile nodes for allowing said mobile node to modify said decision data over said first interface" (*emphasis added*), as recited in the independent claims. In fact, one with skill in the art would not even expect Koskiahde, Veerapalli, and Sharma to disclose, teach, or even suggest the aforementioned elements because not only do the cited references not disclose, teach, or suggest the claimed "second interface ... for allowing said mobile node to modify said decision data," there is not disclosure, teaching, or suggestion of modifying anything, much less decision data using anything resembling the claimed "second interface" over anything resembling the claimed "first interface to said decision data memory for modifying said decision data."

Thus, for at least these reasons, Appellant respectfully submits that Examiner's rejection of claims 1-5, 7-13, 15, and 16 under 35 U.S.C. § 103(a) as being unpatentable over Koskiahde, Veerapalli, and Sharma, taken alone or in any combination, is in clear error and should be reversed.

* * *

CONCLUSION

As established by the arguments in Appellants' original brief, and further elaborated herein in response to the Examiner's Answer, claims 1-5, 7-13, and 15-16 are patentable over the prior art of record, and the Applicants request that the rejections thereof be reversed and the application be remanded for further prosecution.

Respectfully submitted,

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